

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: SUNEDISON, INC. SECURITIES
LITIGATION

Civil Action No. 1:16-md-2742-PKC

This Document Relates To:

Horowitz et al. v. SunEdison, Inc. et al.,
Case No. 1:16-cv-07917-PKC

**STIPULATION AND [PROPOSED] ORDER TO INCREASE THE MAXIMUM
NUMBER OF DEPOSITIONS ALLOWED**

WHEREAS, the parties are currently engaged in fact discovery in the above-captioned action (the “Action”);

WHEREAS, the parties intend to begin taking depositions of fact witnesses in connection with fact discovery in the “Action”;

WHEREAS, Rule 30(a)(2)(A)(i) of the Federal Rules of Civil Procedure allows each party to take a maximum of ten depositions;

WHEREAS, the parties anticipate the need to take additional depositions;

WHEREAS, the parties agree to increase the maximum number of depositions allotted to each side from ten to twenty;

WHEREAS, the parties agree to take depositions of no more than three representatives of any Underwriter Defendant, but reserve all rights to seek additional depositions of representatives of any party as appropriate; and

WHEREAS, the parties have not previously requested to increase the maximum number of depositions allowed to each party under the Federal Rules.

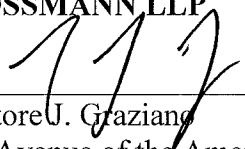
NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the parties hereto, that each side may take a maximum of twenty depositions, and that

plaintiffs shall not take depositions of more than three representatives of any one Underwriter

Defendant absent good cause shown.

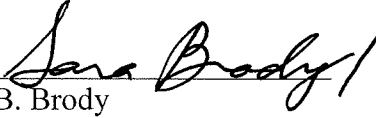
Dated: August 13, 2018

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: 
Salvatore J. Graziano
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444

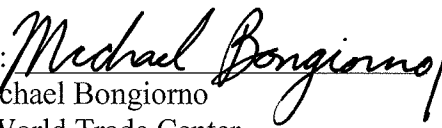
*Counsel for Lead Plaintiff the Municipal
Employees Retirement System of Michigan
and Named Plaintiff the Arkansas Teacher
Retirement System*

SIDLEY AUSTIN LLP

By:  with permission
Sara B. Brody ADH
555 California Street, Suite 2000
San Francisco, CA 94104
Telephone: (415) 772-1200
Facsimile: (415) 772-7400

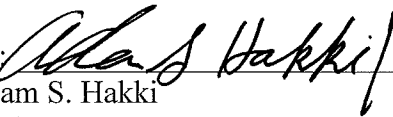
*Counsel for Defendants Ahmad Chatila,
Brian Wuebbels, Emmanuel Hernandez,
Antonio R. Alvarez, Clayton C. Daley, Jr.,
Georganne C. Proctor, Steven V. Tesoriere,
James B. Williams, and Randy H. Zwirn*

WILMERHALE LLP

By:  with permission
Michael Bongiorno ADH
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: (212) 937-7220
Facsimile: (212) 937-7300

Counsel for Defendant Peter Blackmore

SHEARMAN & STERLING LLP

By:  with permission
Adam S. Hakki ADH
Daniel C. Lewis
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 848-4000
Facsimile: (646) 848-4000

Counsel for the Underwriter Defendants

SO ORDERED:

Hon. P. Kevin Castel
United States District Judge

Dated: August __, 2018